

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**NICHOLAS MARTIN on behalf of himself and)
others similarly situated,)**

Plaintiff,)

vs.)

No. 1:13-cv-6923

**JTH TAX, INC. d/b/a LIBERTY TAX)
SERVICE,)**

Defendant.)

Sworn Statement of Martha O’Gorman

I, Martha O’Gorman, being duly sworn, state under oath that:

1. I am the Chief Marketing Officer for JTH Tax, Inc. d/b/a Liberty Tax Service (“Liberty Tax”) and have served in this capacity since 2007.
2. As CMO, I am familiar with the marketing efforts utilized by Liberty Tax and the third-party firms we employ to market our business and our services.
3. I have specifically researched and reviewed the efforts made by Liberty Tax to retain the services of third-party vendors for the purpose of placing telemarketing phone calls during the period at issue in plaintiff’s Complaint.
4. Based on this knowledge, research and review, I have confirmed that the only third-party vendor retained by Liberty Tax to place telemarketing phone calls during the relevant time period was Zee Calls L.L.C. (“Zee Calls”).
5. We have found an additional address for Zee Calls beyond the one previously provided by our counsel. That additional address is: 525 English Place, Mamaroneck, New York 10543. The previous address provided is what we understand to be the official address for Zee Calls per the New York Secretary of State.

6. Billing and payment services with Zee Calls are handled via ACH transfer or wire transfer to a bank account designated by Zee Calls.

Respectfully submitted,

Martha O'Gorman

Martha O'Gorman

JTH Tax, Inc. d/b/a Liberty Tax Service

Subscribed and Sworn to before me
this 13 day of January, 2014.

Sarah Lynn Bosko

Notary Public

